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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JAMES RICHARDSON,

Plaintiff,

v.

GERALD W. ROSE, DOES 1 through 10,

Defendants.

Case No.

NOTICE OF REMOVAL

Notice is hereby given that Defendant Gerald W. Rose, by and through undersigned counsel, has removed "Complaint for Defamation" from the Second Judicial District Court for Washoe County, Nevada to the United States District Court, District of Nevada, on the following grounds:

1. "Complaint for Defamation" is directed against Gerald W. Rose, a federal Aviation Safety Inspector with the Federal Aviation Administration, in a civil action now pending in the Second Judicial District Court for Washoe County, Nevada, Case No. CV22-00862, Dept. No. 6.

2. Copies of all process, pleadings and orders received by this removing party in such action are attached hereto as Exhibit A.

3. "Complaint for Defamation" is one that may be removed without bond to this Court pursuant to Section 1442(a)(1), Title 28, United States Code, for the reason that

1 Plaintiff has filed a civil action in state court against an officer of an agency of the United
2 States relating to an act under color of such office at the time of the alleged events. *See* 28
3 U.S.C. § 1442(a)(1) (a civil action commenced in state court that is against or directed to any
4 officer of an agency of the United States relating to any act under color of such office may be
5 removed to the District Court of the United States).

6 4. A copy of this Notice of Removal is being filed with the Clerk of the Second
7 Judicial District Court for Washoe County, Nevada. This filing will automatically effect the
8 removal action described above in its entirety to this Court for all future proceedings pursuant
9 to 28 U.S.C. § 1446(d).

10 Respectfully submitted this 13th day of June, 2022.

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12 JASON M. FRIERSON
United States Attorney

13 s/ Holly A. Vance
14 HOLLY A. VANCE
Assistant United States Attorney
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Certificate of Service

I, Holly A. Vance, hereby certify that service of the foregoing Notice of Removal was made by sending a copy of the same by first class mail addressed to the following:

James Richardson
P. O. Box 5495
Reno, NV 89513

Dated this 13th day of June, 2022.

s/ Holly A. Vance
HOLLY A. VANCE
Assistant United States Attorney